

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification**

**EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2018 covering the prior calendar year 2017

Date filed: February 26, 2018

Name of company covered by this certification: **South Plains Telephone Cooperative, Inc.**

Form 499 Filer ID: 809154

Name of signatory: Scotty Hart

Title of signatory: CEO/General Manager

I, Scotty Hart, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, safeguards, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company has not taken any actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company has not received customer complaints in the past year concerning the unauthorized release of CPNI.

The company represents and warrants that the above certification is consistent with 47 C.F.R. §1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed 

Attachment: Accompanying Statement explaining CPNI procedures

## ACCOMPANYING STATEMENT

This statement explains how procedures established by South Plains Telephone Cooperative, Inc. ("the Cooperative") ensure the Cooperative's compliance with the FCC's rules on CPNI and its requirements for the safeguarding of such customer information. The Cooperative's operating procedures ensure that it is in compliance with the FCC's CPNI rules because disclosure of, or permitting access to, our customers' CPNI is not allowed without obtaining the requisite customer approval, except as required by law, or the exceptions set forth in 47 U.S.C. §222, and Subpart U of Title 47 of the Code of Federal Regulations; 47 C.F.R. §64.2001 through §64.2011.

The Cooperative has designated a Director for CPNI Compliance who is responsible for communicating with the Cooperative's attorney and/or consultants regarding CPNI responsibilities, requirements and restrictions; supervising the training of the Cooperative employees who use or have access to CPNI; supervising the use, disclosure, distribution or access to the Cooperative's CPNI by independent contractors and joint venture partners; maintaining records regarding the use of CPNI in marketing campaigns; and receiving, reviewing and resolving questions or issues regarding use, disclosure, distribution or provision of access to CPNI.

Appropriate safeguards on the disclosure of CPNI have been implemented in accordance with 47 C.F.R. §64.2010. Customers are properly authenticated before disclosing CPNI on customer-initiated telephone calls or business office visits. Authentication through the use of passwords and back-up authentication questions in the event of lost or forgotten passwords have been implemented. Passwords and back-up authentication security questions are established in accordance with 47 C.F.R. §64.2010(e).

The Cooperative has internal procedures in place to educate our employees about CPNI and the disclosure of CPNI. Employees with access to this information are aware of the FCC's rules and are prohibited from disclosing or permitting access to CPNI without the appropriate customer consent or as allowed by law and the FCC rules. In accordance with company policy, any employee that uses, discloses, or permits access to CPNI in violation of Federal regulations is subject to disciplinary action and possible termination.

The Cooperative complies with the FCC's rules regarding the notification of law enforcement and customers in the event of a CPNI breach. The Cooperative maintains a record for at least two years of any breaches discovered, notifications made to law enforcement (i.e., United States Secret Service and the Federal Bureau of investigation) and customers, and responses from law enforcement.

It is the Cooperative's policy to not disclose or provide access to CPNI to joint venture partners or independent contractors for marketing purposes. Currently, the Cooperative has no joint venture partners. However, if this changes in the future and the Cooperative decides to share customers' CPNI for marketing purposes, CPNI will be shared of only those customers who have given express consent (opt-in approval) to do so.

South Plains Telephone Cooperative, Inc.  
2018 CPNI Certification Covering 2017

To the best of my knowledge and belief, the Cooperative does not presently use, sell, or otherwise release CPNI for marketing or other commercial purposes. If our customers' CPNI is to be used for sales and marketing campaigns in the future, the appropriate safeguards will be implemented in accordance with 47 C.F.R. §64.2009(c), (d) and (f).